No._____

IN THE

SUPREME COURT OF THE UNITED STATES

RAMON VASQUEZ

(Petitioner)

v.

CITY OF READING & THOMAS K. FLEMMING

(Respondents)

PETITION FOR WRIT OF CERTIORARI

On Petition for Writ of Certiorari to the Commonwealth Court of Pennsylvania, Docket No. 1770 CD 2016, entered 9/27/17. Affirming the opinion and Order of the Court of Common pleas, of Berks County Pennsylvania, Docket No. 15-21304, entered 9/29/16.

Ramon Vasquez
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QUESTION PRESENTED FOR REVIEW

1. The Supreme Courts' precedent set forth in Houston v. Lack, 487 U.S. 266, 276 (1988) dictates that a document is considered filed with the court at the time a prisoner hands it over to prison officials for purpose of mailing. Does the state Supreme Courts' decision to deny Vasquezs' petition for Allowance of Appeal "Nunc Pro Tunc" conflict with the high courts' precedent?

(Suggested answer Yes)

2. Both U.S. and state constitution entitle legally interested parties a reasonable opportunity to be heard before a fair tribunal. Vasquez was given (30) days to contest Defendant's motion to dismiss. But the trial court immediately dismissed his complaint sua sponte upon review of its former president judges' incorrect authority. If the "resolved" aspect of the matter can be shown to be legally flawed, should Vasquez be entitled to a remand?

(Suggested answer Yes)

3. In Pennsylvania, courts shall be opened and its citizens entitled to seek redress for injuries and wrongs done upon them. The trial courts' abuse of discretion dismissed Vasquezs' complaint sua sponte, but

Vasquez was not barred from litigating his case. As the plaintiff, Vasquez also had a fundamental interest in the proceedings. Did the trial court abridge Vasquezs' substantive rights?

(Suggested answer Yes)

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

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IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

OPINION BELOW

Petitioner respectfully prays that a Writ of Certiorari issue to review the judgment below.

State Court

The opinion of the Commonwealth Court, No. 1770 CD 2016; was the highest state court to review the merits appear at Appendix "A" to the petition and is unpublished.

The opinion of the Court of Common Pleas, Berks County, Pennsylvania No. 15- 21304; appears at Appendix "B" to the petition and is unpublished.

The opinion of the United States District Court, Eastern District of Pennsylvania, No. 15-4297; appears at Appendix "C" to the petition and is unpublished.

JURISDICTION

The date on which the highest state court decided my case was January 26, 2018, a copy of that decision appears at Appendix "D."

A timely Application for Reconsideration was thereafter denied on the following date: March 16, 2018, and a copy of that Order denying reconsideration also appears at Appendix "D.""

The jurisdiction of this Court is invoked under 28 U.S.C. § 1257 (a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

14th Amendment of the United States Constitution provides; All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States wherein they reside. No state shall make or enforce any law, which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property without due process of law; nor deny to any person within its jurisdiction equal protection of the law.

Article 5 § 9 Pennsylvania Constitution, provides; There shall be a right of appeal in all cases to a court of the record from a court not of the record; and there shall also be a right of appeal from a court of record from an administrative agency to a court of record or to an appellate court. The selection of such court to be as provided by law; and there shall be such other rights of appeal as may be provided by law.

Article 1§ 11 Pennsylvania Constitution, provides;
All courts shall be opened; and every man for an injury done him in his lands, goods, person or reputation shall have remedy by due course of law, and right and justice administered without sale, denial or delay. Suits may be brought against the Commonwealth in such manner, in such cases as the Legislature may by law direct.

Article 5 § 17 (b) Pennsylvania Constitution, provides; Justices and judges shall not engage in any activity prohibited by law and shall not violate any canon of legal or judicial ethics prescribed by the Supreme Court. Justices of the peace shall be governed by rules or canons, which shall be prescribed by the Supreme Court.

Pa.R.C.P. 233.1, Frivolous Litigation, provides, (a) upon the commencement of any action filed by a pro se plaintiff in the Court of Common Pleas. A defendant may file a motion to dismiss the action on the basis that: 1. The pro se plaintiff is alleging the same or related claims which the pro se plaintiff raised in a prior action against the same or related defendant's and 2. The claims have been resolved pursuant to a written settlement agreement or a court proceeding.

STATEMENT OF CASE

The petitioner Ramon Vasquez, who is currently confined at SCI- Huntingdon, 1100 Pike St., Huntingdon, Pa. 16654-1112. Hereby petitions this honorable court for a **Petition for Writ of Certiorari**, of the Pennsylvania, State Supreme Courts' Order entered March 16, 2018, that dismissed Vasquez's Application for Reconsideration.

Accordingly, Vasquez filed a timely Petition for Allowance of Appeal to the Pennsylvania Supreme Court under the prison mailbox rule. Vasquez handed his petition to prison officials October 26, 2017, for purpose of mailing. However, a combination of insufficient cash slips, and a lack luster mail processing method over lapsed the time of eligibility for his appeal. The Supreme Court therefore sent Vasquez a letter informing him that he was beyond the prescribed time for his appeal. Vasquez then filed to have his appeal rights restored "nunc pro tunc" as he was free from fault. Unfortunately, his petition was still denied. See (Appendix "D" Pa. S.CT. Docket No. 194 MM 2017; letter & Orders 11/1517, 1/26/18, and 3/16/18).

As such, early 2013, Vasquez was involved in a relationship with a female named Arwin Santee, at the time Vasquez owned a red color

Toyota Camry, however, the registration to the car had expired, and his license was suspended. Unable to register the car Santee convinced Vasquez to register the car in her name because she had a valid license and could make the car street legal. Vasquez agreed and registered the car in Santees' name.

On or about the beginning of April, Vasquez ended his relationship with Santee. He then moved his belongings to his cousins' residence at 935 Oley St. in the city of Reading. There, Vasquez left the car in possession of Ignacio Vigo because Vasquez did not want to be driving without a license. Vasquez later moved to Philadelphia to attend Community College.

Santee, still upset over the break up began to call and harass Vasquez over money issues and tickets she had received over the car. Vasquez informed Santee that he would pay the tickets and take the car out of her name as soon as possible. Vasquez also advised her where the the car was and who was in possession.

Nevertheless, out of spite Santee made out a fraudulent complaint to the Reading police namely Defendant Thomas K. Flemming accusing Vasquez of taking her car. Santee claimed that Vasquez lived at 935

Oley St., and she had arranged with Vasquez to allow her to park her car on the 900 block of Oley St. She then claimed she contacted Vasquez a few days prior and told him that she wanted her car back and would pick it up at a certain time and in a specific location. Santee claimed when she went to pick up the car and it was not at the agreed upon location. Several attempts to contact Vasquez failed because his phone was allegedly disconnected. Santee then falsely informed Flemming she had contacted Vasquezs' family who supposedly told her that he moved to Philly and took the car with him.

But Vasquez never lived at 935 Oley St., Vigo did, in fact Vasquez already had been living in the Philadelphia area weeks before Santees' fraudulent allegations. See (Appendix "E") Moreover, Vigo issued a notarized statement that he had been in possession of the car the entire time and never contacted by Santee or Flemming regarding the car. See (Appendix "F"). Under the totality of circumstances, Flemming failed to fulfill his due diligence on the situation and either 1. Check 935 Oley St., or 2. Contact the third person in Santees' story and conclude whether her information was reasonably trustworthy. Instead, with

only mere suspicion Flemming file a criminal complaint against Vasquez charging him with unauthorized use of a motor vehicle.

June 19, 2013, Vasquez appeared at the Magisterial District Justices' Office in the city of Reading to pay off the tickets he had promised. While there, the judge informed Vasquez that there was an active warrant for unauthorized use of a motor vehicle. Unaware of any criminal complaint Vasquez informed the judge that the allegations were false. Vasquez then politely excused himself to the restroom and expressed his intent to contact an attorney. However, the judges' security guard daughter wrongly assumed that Vasquez was fleeing and yelled, "He's not coming back!" In turn, the judge abruptly removed himself from the bench and cut Vasquez off from exiting the courtroom.

The judge and his daughter then physically assaulted Vasquez in an attempt to restrict his movements, but Vasquez instinctively ran out of the office to get away from being assaulted. The entire incident was captured on video through the digital surveillance system from inside the district justices' office. Ironically, that material piece of evidence was later somehow suspiciously destroyed.

While outside, both judge and his daughter continued to stalk after Vasquez, and yelled for people on the street to grab Vasquez. An unknown male tried to tackle Vasquez off his motorcycle as he was pulling off. The commotion caused the motorcycle to lift up and the male thrown off. Disoriented, Vasquez subsequently lost control of the motorcycle and crashed into a guardrail. As Vasquez picked up the motorcycle another unknown male later identified as an "off-duty" police officer exited his vehicle. The "off-duty" officer drew his gun upon Vasquez, yelled for Vasquez to get down, punched Vasquez in the face, and simultaneously snatched the key from the ignition of the motorcycle. Fearful for his life, Vasquez took off running, Vasquez later turned himself into custody. The charge for unauthorized use of a motor vehicle was dismissed without a hearing at the magistrate level September 20, 2013.

As such, on or about August 3, 2015, Vasquez filed a civil rights complaint under 42 U.S.C. § 1983 in the United States District Court, Eastern District of Pennsylvania. Against multiple Defendant's including the City of Reading and Thomas K. Flemming, alleging False Arrest & Imprisonment, Malicious Prosecution, and several Torts.

Judge Jeffrey Schmehl presided over the matter and summarily dismissed the complaint with prejudice, for failure to state a claim, and lack of jurisdiction.

Schmehls' reasoning behind the dismissal were that (1) Vasquez was time barred, (2) probable cause existed solely on Santees' fraudulent allegation's, and (3) the judges' physical assault upon Vasquez was barred by absolute immunity. See (Appendix "C", U.S. Dist. Ct.; No. 15-4297; 8/11/15, opinion pg. 4-7)

Surprisingly, Vasquez later discovered that Schmehl had history invested in the City of Reading, and a relationship as the former judicial supervisor with the judge involved. Even the trial court conceded that a reasonable relationship existed between Schmehl and the judge involved. See (Appendix "B", Ct. of Comm. Pl., Berks Co.; No. 15-21304, 9/29/15, opinion pg. 5) Considering the close ties connected within the complaint, Schmehl could have easily recused himself from the proceedings, but refused to.

Accordingly, Vasquez later re-filed his complaint in state court against the City of Reading and Flemming. Defendant's moved for dismissal of the complaint under Pa.R.C.P. 233.1, claiming Vasquezs'

complaint was both frivolous and already resolved in federal court. Vasquez was given (30) days to contest the motion, unfortunately, after only eight days of filing the trial court immediately dismissed Vasquezs' complaint sua sponte. With prejudice, and without affording him an equal opportunity to respond. Sensibly, Vasquez appealed the trial courts' decision to the Commonwealth Court, and presented the following concise statement of errors complained of on appeal.

1. Defendant Flemming failed to view the circumstances through the eyes of a trained police officer and contacted the third person in Santees' story i.e. Vasquezs' family, to conclude if her information was reasonably trustworthy.

2. The court failed to give Vasquez an equal opportunity to be heard in answering Defendant's motion to dismiss under Pa.R.C.P.233.1.

3. Vasquezs' complaint was not the result of serial lawsuits, dismissal in federal court does not automatically bar him from bringing his claims in state court for the first time where the facts and evidence have merit to show cause for relief.

4. Dismissal of Vasquezs' complaint should not have been supported by the ruling of a biased tribunal whose impartiality was reasonably questioned because if his relationship with the district justice and Defendant's.

5. Vasquez, innocent of the crime for unauthorized use of a motor vehicle, was cleared on September 20, 2013, without a hearing, Defendant's motion to dismiss clearly concedes to the true issue of the plaintiffs' civil rights action.

Consequently, the trial courts' reasoning was a dry-exchange of the federal courts decision 1. That Vasquez was time barred, and 2. Probable cause existed solely based on Santees' fraudulent allegations. See (Appendix "B" supra; pg. 1-6) However the Commonwealth Court narrowed its views upon two issues 1. Whether the trial court failed to give Vasquez an opportunity to respond to the motion, and 2. Whether Vasquezs' complaint was a frivolous serial lawsuit. Although the Commonwealth Court noted, that a better practice would have been for the trial court to have given Vasquez the right to respond to the motion. It concluded that that the underlying merits were not before the trial court so remand was not warranted. The Commonwealth Court determined that Vasquezs' complaint was related, compared to his federal lawsuit, and that the issue had been resolved. Finally, the Commonwealth Court affirmed the trial courts' decision. See (Appendix "A", Commw. Ct., Docket No. 1770 CD 2016; 8/2/17 pg. 1-6).

STATEMENT OF REASONS

This court should grant Writ of Certiorari review because:

A. The holding of the state Supreme Court conflicts with precedent case law set forth in Houston v. Lack, regarding the prison mailbox rule.

Pursuant to the prison mailbox rule, a prisoners' complaint is considered filed at the time he hands it over to prison authorities for forwarding to the court, Houston v. Lack[1].

The pro se prisoners' state of incarceration prohibits any monitoring of the filing process. In the interest of Fairness, a pro se prisoners' appeal shall be deemed to be filed on the date that he delivers the appeal to prison authorities and/or places his notice of appeal in the institutional mailbox. The court warned that this holding applies only to pro se petitioners, who are incarcerated, Smith v. Pa. Bd. of Parole[2].

In the case before the court, Vasquez was confined at SCI-Somerset, 1600 Walter Mills rd., Somerset, Pa. 15510. The intermediate court denied his application for reargument September 27, 2017. See (Appendix "A") As such, Vasquez handed his petition for allowance of

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[1] 487 U.S. 266, 276 (1988)
[2] 546 Pa. 115, 683 A.2d. 278 (1996)

appeal to the supreme court to prison officials, Thursday evening October 26, 2017, for purpose of mailing as shown on the certificate of service. However, Vasquezs' unit did not have available cash slips to cover the cost of postage rates at the time. Therefore, his petition was not mailed the following day.

Accordingly, the institution received more cash slips on the weekend and Vasquez signed for his cash slip Sunday evening for mailing the following Monday. Unfortunately, the institution did not mail his petition until November 1, 2017. The supreme court sent Vasquez a letter informing him that he was beyond his eligible appeal time, but offered an alternative to file "nuc pro tunc".

Sensibly, Vasquez filed to have his allowance of appeal restored "nunc pro tunc". Vasquez outlined the extraordinary circumstances, and asserted that he was free from fault, as he had no control over the institutions' lack of cash slips or its sluggish mail processing methods. Consequently, the supreme court denied his petition for allowance of appeal. See (Appendix "D")

B. **The intermediate court had overlooked the trial courts' abuse of discretion towards Vasquezs' entitlement to be heard. Whereas the "resolved" aspect of the matter can be shown to be legally flawed.**

The fundamental requirement of due process is the opportunity to be heard at a meaningful matter, due process also requires adequate notice, Keller v. Muller[3].

The language in Pa.R.C.P. 233.1 assures that the pro se litigant is availed of a chance to address his claims subject to contractual guarantee of a settlement agreement or to the procedural safeguards that attend a court proceeding, Coulter v. Ramsden[4].

In the instant matter, Vasquez was given (30) days to respond to Defendant's motion to dismiss. But after just eight days of filing the trial court immediately dismissed his complaint sua sponte without affording him an equal opportunity to respond.

. Pa.R.C.P. 233.1 (d) provides, the court may sua sponte dismiss an action that is filed in violation of a court order entered under subdivision (c).

. Pa.R.C.P. 233.1 (c) provides, upon granting the motion and dismissing the action, the court may bar the pro se plaintiff from pursuing additional pro se litigation against the same or related Defendant's without leave from the court.

Clearly, Vasquez did not fall within the ambit of subdivision (d),

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[3] 2001 Pa. Super 425; 861 A.2d. 984 (2004)
[4] 2014 Pa. Super 127; 94 A.3d. 1080 (2014)

Which would have barred him from litigating his claims. Even the Commonwealth Court noted, that a better practice would have been for the trial court to have given Vasquez the right to respond to the motion. See (Appendix "A," Commw. Ct., Docket No. 1770 CD 2016, 9/27/17; opinion pg. 4)

Accordingly, two prongs anchor this procedural rule; it is the "resolved" and "related" aspects. While Vasquez does not dispute the form or subject matter in the "related" aspect of the complaint. He draws this courts' attention to the incorrect authority relied upon by the trial court to enforce its ruling within the "resolved" aspect. August 3, 2015, Vasquez filed this compliant in the United States District Court, Eastern District of Pennsylvania. Judge Jeffrey Schmehl presided over the matter and summarily dismissed Vasquezs' complaint with prejudice for failure to state a claim, and lack of jurisdiction.

First, although the charge was dismissed without a hearing at the magistrate level September 20, 2013, Schmehl ruled that Vasquez was beyond the statute of limitations. By contrast, 42 Pa.C.S. § 5502 (a) provides, a cause of action accrues when the injured party is first able to

litigate his claims, Simmons v. Cohen[5]. The statute of limitations begins to run when the alleged false imprisonment ends, reflective of the fact that the false imprisonment consists of detention without legal process. A false imprisonment ends once the victim becomes held to such process- when for example the victim is bound over by a magistrate, Wallace v. Kato[6]. Considering the charge was never bound over meant that the statute of limitations did not expire on Vasquezs' claims until September 19, 2015. Moreover, as the trial court indicated that Vasquezs' complaint was not filed until December 7, 2015, it failed to acknowledge that it had allowed his action to commence under the prison mailbox rule, which showed the actual filing date September 16, 2015. Therefore, Vasquezs' complaint was not beyond the statute of limitations.

Secondly, Schmehl and the trial court found that probable cause existed solely based off Santees' fraudulent allegations to Flemming. By contrast, the elements of false imprisonment are (1) the detention of another person, and (2) the unlawfulness of such detention. An arrest based on probable cause would be justified, regardless if the individual

[5] 111 Pa. Commwlth, 267, 534 A.2d. 140 (1987)
[6] 549 U.S. 384, 127, S.ct. 1091, 166 L.ed. 2d. 973 (2007)

-is guilty or not, Manley v. Fitzgerald[7]. "Sufficient probability, not certainty is the touchstone of reasonableness under the Fourth Amendment," Hill V. Cal[8]. To be constitutionally valid, an arrest must be based on probable cause, U.S. Const. Fourth Amend. The existence or non-existence of probable cause is determined by the totality of circumstances. The totality of circumstance test requires a court to determine whether the facts and circumstances, which are within the knowledge of the officer at the time of arrest, and of which he has reasonable trustworthy information, are sufficient to warrant a man of reasonable caution in the belief that the suspect has committed or is committing a crime, Commonwealth v. Dunlap[9].

Schmehl, and the trial court refused to acknowledge the totality of circumstances that rested on Flemmings' responsibility of due diligence. Namely, Flemmings' failure to either (1) check 935 Oley St., where he would have encountered Vigo, the car, and possibly resolved the situation, or (2) contact the third person in Santees' story i.e. Vasquezs' family to conclude if the information received was reasonably -

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[7] 997 A.2d. 1235, 1241 (Pa. Commw. Ct. 2010)
[8] 401 US. 797, 804 (1971)
[9] 596 Pa. 147; 941 A.2d. 671 (2007)

trustworthy. Instead, with only mere suspicion Flemming filed a false criminal complaint against Vasquez with information in his affidavit he knew or should have known was false.

Thirdly, Schmehl determined that the actions of the district justices' willful and malicious assault on Vasquez were barred by absolute immunity. By contrast, Protection of judicial immunity is extended to all "judicial acts" unless those acts fall clearly outside the judges' subject matter jurisdiction, Harper v. Merckle[10]. Going beyond the pale of authority to physically assault an innocent individual, then destroying the video that captured the incident was not a judicial act it was a crime. The due process clause has been implemented by objective standards that do not require proof of actual bias to justify recusal of a judge. In defining these standards, a court ask whether under realistic appraisal of psychological tendencies and human weakness, the interest pose such a risk of actual bias or prejudgment that the practice must be forbidden if the guarantee of due process is to be adequately implemented, Caperton v. A.T. Massey Coal[11].

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[10] 638 F.2d. 848 (5th Cir. 1981)
[11] 556 U.S. 129, S.ct. 173 L.ed. 2d. 1208 (2009)

Accordingly, Vasquez later discovered that Schmehl had history invested in Defendant City of Reading and a relationship as former judicial supervisor with the district justice involved. Even the trial court conceded that a reasonable relationship exited between Schmehl and the judge. See (Appendix "B", Ct. Comm. Pl., Berks County, Docket No. 15- 21304; 9/29/16, opinion pg.) As such, Schmehl could have easily recused himself from the proceedings but refused to. Given the flaws in Schmehls' ruling, his connections to the City of Reading and the judge involved a reasonable inference may be drawn, that puts his impartiality over the matter into question. Combine those factors with the trial courts' abuse of discretion and a Pandora's box begins to open. This matter was not justly "resolved" there was a substantial taint that is sensibly in view. Based on these factors Vasquezs' petition should be granted.

C. The intermediate court had overlooked the trial courts' abuse of discretion towards Vasquezs' substantive right in the proceeding. Whereas Vasquez was entitled to a full hearing in Defendant's motion to dismiss.

A simple analysis of the state constitution shows that the trial court abrogated Vasquezs' substantive right to a full hearing.

. Article 1§ 11 of the Pennsylvania Constitution, provides, all courts shall be opened; and every man for injury done him in his lands, goods, person or reputation shall have remedy by due course of law, and right and justice administered without sale, denial or delay.

The Pennsylvania Constitution provides that the Supreme Court shall have the power to prescribe general rules governing practice, procedure, and conduct of all court if such rules are consistent with the constitution and neither abridge, enlarge, nor modify the substantive rights of any litigant. Pennsylvania Constitution article 5§ 10 (c) the Supreme Court has held that when determining if a rule is substantive or procedural in nature, courts must seek to determine the purpose of the rule in order to properly characterize its nature, Coulter v. Lindsay[12].

The explanatory comment to Pa.R.C.P. 233.1 indicate that the purpose behind rule 233.1 is to ease congestion in the courts by eliminating frivolous pro se litigation. That purpose makes the rule procedural and not substantive. Moreover, even assuming arguendo that rule 233.1 impacts a party's substantive right, the Pennsylvania Supreme Court is not prevented from exercising its duty to resolve

[12] 2017 Pa. Super 92; 159 A.3d. 947 (2017)

-procedural question merely because a collateral effect on a substantive right. Any effect upon a party's substantive right is collateral, as rule 233.1 preserves the party's right to at least one prior substantive presentation of her claims, id.

In the case at bar, Vasquez was denied the right to challenge Defendant's motion in open court. It is well settled within judicial ethics that all judges shall accord to every person who has a legal interest in a proceeding the right to be heard according to law. As the plaintiff, Vasquez had a fundamental interest in the proceedings and should have been afforded a full hearing on the matter because he was not barred from litigating his claims.

. Article 5§ 17 (b) of the Pennsylvania Constitution provides, justices and judges shall not engage in any activity prohibited and shall not violate any canon of legal or judicial ethics prescribed by the Supreme Court.

As such, the trial courts' sua sponte dismissal of Vasquezs' complaint proved to be both reasonably unethical and contrary to the rule, this equates an abuse of discretion. Unless a court has the parties before it, by appearance, or service of process, it is obvious that it cannot bind them by its adjudication. Lack of notice and an opportunity to be-

heard constitutes a violation of due process of law and results in an invalid judgment, Kelly v. Mueller (supra)

. Pa.R.C.P. 208.3 (a) provides, except as otherwise provided by subdivision (b), the court shall initially consider a motion without written response of brief. For a motion governed by this subdivision, the court may **not** enter an order that grants relief to a moving party unless the motion is presented as uncontested or the other parties to the proceeding are given an opportunity for an argument.

The supporting authorities are clear and unambiguous here; the trial court abridged Vasquezs' substantive right in the proceeding. Based on these factors this court should grant Vasquezs' petition.

CONCLUSION

Wherefore, all the above reasons mentioned herein Vasquez respectfully prays that this honorable court **GRANT** the foregoing Petition for Writ of Certiorari.

Respectfully submitted,

6/13/18

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